

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

JEFFREY EVANS, Derivatively On Behalf of )	Civil Action No. CV 05-1818 JMR/FLN
NAVARRE CORPORATION, )	
) Plaintiff,	
) vs.	
) ERIC H. PAULSON, JAMES G.	)
) GILBERTSON, BRIAN M.T. BURKE, CARY	)
) L. DEACON, KEITH A. BENSON,	)
) CHARLES E. CHENEY, TIMOTHY R.	)
) GENTZ, TOM F. WEYL, DICKINSON G.	)
) WILTZ, JAMES G. SIPPL, MICHAEL L.	)
) SNOW AND ALFRED TEO,	)
) Defendants,	)
) NAVARRE CORPORATION, a Minnesota	)
) corporation,	)
) Nominal Defendant.	)
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JOAN M. BREWSTER, Derivatively On )	Civil Action No. CV 05-2044 JMR/FLN
Behalf of NAVARRE CORPORATION, )	
) Plaintiff,	
) vs.	
) ERIC H. PAULSON, JAMES G.	)
) GILBERTSON, BRIAN M.T. BURKE, CARY	)
) L. DEACON, KEITH A. BENSON,	)
) CHARLES E. CHENEY, TIMOTHY R.	)
) GENTZ, TOM F. WEYL, DICKINSON G.	)
) WILTZ, JAMES G. SIPPL, MICHAEL L.	)
) SNOW AND ALFRED TEO,	)
) Defendants,	)
) NAVARRE CORPORATION, a Minnesota	)
) corporation,	)
) Nominal Defendant.	)

[Caption continued on next page]

WILLIAM BLOCK, Derivatively On Behalf of) Civil Action No. CV 05-2067 JMR/FLN  
NAVARRE CORPORATION,)  
Plaintiff,)  
vs.)  
ERIC H. PAULSON, JAMES G.)  
GILBERTSON, BRIAN M.T. BURKE, CARY)  
L. DEACON, KEITH A. BENSON,  
CHARLES E. CHENEY, TIMOTHY R.  
GENTZ, TOM F. WEYL, DICKINSON G.  
WILTZ, JAMES G. SIPPL, MICHAEL L.  
SNOW AND ALFRED TEO,  
Defendants,)  
NAVARRE CORPORATION, a Minnesota  
corporation,)  
Nominal Defendant.)

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**MOTION TO COMPEL**

Plaintiffs, pursuant to Fed. R. Civ. P. 37(a)(2)(B), move this Court for an Order compelling Defendants to respond to discovery requests as required by the Federal Rules of Civil Procedure. As requested by the Court, counsel for the parties met and conferred following the status conference with the court on March 23, 2006, and have conferred by telephone subsequently, but have been unable to reach agreement on the issues presented. Defendants were served discovery requests following this Court's Order granting Plaintiffs permission to serve discovery regarding the Special Litigation Committee's report. To date, Defendants have objected to all of Plaintiffs' discovery requests and produced only a minute amount of the discovery requested, partially responding to request for production numbers 3 and 10.

Respectfully Submitted,  
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